



Corporate Center
P.O. Box 6820
One Centennial Avenue
Piscataway, NJ 08854 USA

Tel: (732) 652-7000

www.ingersollrand.com

Via UPS Overnight

October 11, 2010

Mr. Craig Whitenack, Civil Investigator
United States Environmental Protection Agency
Region IX, Southern California Field Office
600 Wilshire Blvd., Suite 1460
Los Angeles, CA 90017

**Re: United States Environmental Protection Agency, Region IX
Follow Up Request for Information Pursuant to 42 U.S.C. § 9604(e)
Pertaining to the Yosemite Creek Superfund Removal Site
San Francisco, CA
Liable Company Name: Ingersoll-Rand Company
Generator Company Name: Schlage Lock**

Dear Mr. Whitenack:

This letter supplements our January 8, 2010 response to your request for information ("RFI") to Ingersoll-Rand Company ("Ingersoll Rand") with regard to the Yosemite Creek Superfund site (the "Site"). Ingersoll Rand is responding on behalf of Generator Company Schlage Lock Company ("Schlage") who was originally named as a potentially responsible party to the Bay Area Drum State Superfund Site (the "BAD Site") at 1212 Thomas Avenue in San Francisco, California. Accordingly, this response, similar to Schlage's earlier responses to the United States Environmental Protection Agency ("EPA") and the California Environmental Protection Agency, Department of Toxic Substances Control ("DTSC"), is solely on behalf of Schlage.

Without waiving any of its objections, Schlage herein incorporates by reference the entirety of our prior response, including without limitation all general answers, protections, privileges, and defenses. The following answers are intended to supplement those already provided and Schlage reserves the right to supplement in the future should more information become available.

SUPPLEMENTAL RESPONSES TO OCTOBER 15, 2009 EPA INFORMATION REQUESTS

1. *Describe generally the nature of the business conducted by Respondent and identify the products manufactured, formulated, or prepared by Respondent throughout its history of operations.*

RESPONSE:

During the relevant time period, 1940-1988, Schlage manufactured residential and business/commercial security products. Such products included: door locks, handles, knobs, levers, exit devices, closers, frames, padlocks, deadbolts, and front entry handle sets.

2. *Provide the name (or other identifier) and address of any facilities where Respondent carried out operations between 1940 and 1988 (the "Relevant Time Period") and that:*
 - a. *Ever shipped drums or other containers to the BAD Site for recycling, cleaning, reuse, disposal, or sale.*
 - b. *Are/were located in California (excluding locations where ONLY clerical/office work was performed);*
 - c. *Are/were located outside of California and shipped any drums or other containers to California for recycling, cleaning, reuse, disposal, or sale (for drums and containers that were shipped to California for sale, include in your response only transactions where the drums and containers themselves were an object of the sale, not transactions where the sole object of the sale was useful product contained in a drum or other container).*

RESPONSE:

- a. Schlage has not located any documents other than those identified in the course of the DTSC investigation and ultimate settlement regarding Bay Area Drum in 2001. Those documents are limited to the San Francisco, CA manufacturing facility.
 - b. Schlage had two manufacturing facilities in California during the relevant 1940-1988 time period:
 1. Schlage Lock Company, 2401 Bayshore Boulevard, San Francisco, CA 94134.
 2. Schlage Lock Company, 1700 Barranca Parkway, Irvine, CA 92606.
 - c. None.
3. *Provide a brief description of the nature of Respondent's operations at each Facility identified in your response to Question 2 (the "Facilities") including:*
 - a. *The date such operations commenced and concluded; and*
 - b. *The types of work performed at each location over time, including but not limited to the industrial, chemical, or institutional processes undertaken at each location.*

RESPONSE:

- a. Schlage operated a manufacturing facility in San Francisco from 1929-1999. Schlage operated a manufacturing facility in Irvine from 1968-1977.
- b. Operations at both facilities consisted mainly of cutting metal, fabricating locks and frames, metal casting, machining, grinding and metal forming, metal plating/degreasing, metal casting, and painting.

Letter to Craig Whitenack
October 11, 2010
Page 3 of 3

If you have any questions regarding our supplemental response to this information request, please contact me at (732) 652-6728.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Aaron Kleinbaum', with a long horizontal flourish extending to the right.

Aaron Kleinbaum
Vice President – Environment, Health & Safety
and Deputy General Counsel